

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GREGORY PARRY,

Plaintiff,

v.

Case No. 2:22-cv-11328-DPH-DRG

Hon. Denise Page Hood

HOSPICE OF MICHIGAN, INC., a
Michigan non-profit corporation, et al.

Defendants.

Sarah S. Prescott (P70510)
Annemarie Smith-Morris (P87221)
SALVATORE PRESCOTT
PORTER & PORTER, PLLC
Attorneys for Plaintiff
105 East Main Street
Northville, MI 48167
(248) 679-8711
prescott@sppplaw.com
smith-morris@sppplaw.com

Kenneth M. Mogill (P17865)
MOGILL, POSNER & COHEN
Attorneys for Plaintiff
27 E. Flint St., 2nd Floor
Lake Orion, MI 48362
(248) 814-9470
kmogill@bignet.net

David R. Deromedi (P42093)
Angelina Rose Delmastro (P81712)
DICKINSON WRIGHT PLLC
Attorneys for Defendant
500 Woodward Ave., Suite 4000
Detroit, MI 48226
(313) 223-3048
dderomedi@dickinsonwright.com
adelmastro@dickinsonwright.com

**PLAINTIFF'S MOTION FOR MISCELLANEOUS RELIEF: STATUS
CONFERENCE**

NOW COMES Plaintiff GREGORY PARRY, by and through his undersigned counsel of record, and for his Motion for Miscellaneous Relief, he states the following:

1. This case has been pending since June 15, 2022.
2. While Defendants filed a 12(b) motion, they have asked to withdraw it in Docket Entry 47, PageID.515-518.
3. Plaintiff also filed a motion for disqualification, which Plaintiff withdrew in Docket Entry 43, PageID.460-462.
4. Discovery is closed and no summary judgment motion has been filed.
5. In anticipation of trial, the parties mediated the case last week and could not settle.
6. Plaintiff seeks a prompt trial date, given the above.

RELIEF REQUESTED

WHEREFORE, the Plaintiff seeks from the Court a status conference and trial date.

Respectfully Submitted,
SALVATORE PRESCOTT
PORTER & PORTER, PLLC

Dated: September 3, 2024

/s/ Sarah S. Prescott

By: Sarah S. Prescott (P70510)
Annemarie Smith-Morris (P87221)
Attorneys for Plaintiff
105 East Main Street
Northville, MI 48167

(248) 679-8711
prescott@sppplaw.com
smith-morris@sppplaw.com

and

MOGILL, POSNER & COHEN

/s/ Kenneth M. Mogill

By: Kenneth M. Mogill (P17865)
Attorneys for Plaintiff
27 E Flint St, 2nd Floor
Lake Orion, MI 48362
(248) 814-9470
kmogill@bignet.net

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GREGORY PARRY,

Plaintiff,

v.

Case No. 2:22-cv-11328-DPH-DRG

Hon. Denise Page Hood

HOSPICE OF MICHIGAN, INC., a
Michigan non-profit corporation, et al.

Defendants.

Sarah S. Prescott (P70510)
Annemarie Smith-Morris (P87221)
SALVATORE PRESCOTT
PORTER & PORTER, PLLC
Attorneys for Plaintiff
105 East Main Street
Northville, MI 48167
(248) 679-8711
prescott@sppplaw.com
smith-morris@sppplaw.com

Kenneth M. Mogill (P17865)
MOGILL, POSNER & COHEN
Attorneys for Plaintiff
27 E. Flint St., 2nd Floor
Lake Orion, MI 48362
(248) 814-9470
kmogill@bignet.net

David R. Deromedi (P42093)
Angelina Rose Delmastro (P81712)
DICKINSON WRIGHT PLLC
Attorneys for Defendant
500 Woodward Ave., Suite 4000
Detroit, MI 48226
(313) 223-3048
dderomedi@dickinsonwright.com
adelmastro@dickinsonwright.com

**PLAINTIFF'S BRIEF IN SUPPORT OF MOTION FOR MISCELLANEOUS
RELIEF: STATUS CONFERENCE**

In support of the motion filed herein, Plaintiff cites the facts identified and the Court's authority to set trial schedules pursuant to Fed. R. Civ. P. 16.

CONCLUSION

For these reasons, Plaintiff respectfully requests this Court grant the relief requested in his Motion, to set a status conference and trial date in this matter.

Respectfully Submitted,
SALVATORE PRESCOTT
PORTER & PORTER, PLLC

Dated: September 3, 2024

/s/ Sarah S. Prescott

By: Sarah S. Prescott (P70510)
Annemarie Smith-Morris (P87221)
Attorneys for Plaintiff
105 East Main Street
Northville, MI 48167
(248) 679-8711
prescott@sppplaw.com
smith-morris@sppplaw.com

and

MOGILL, POSNER & COHEN

/s/ Kenneth M. Mogill

By: Kenneth M. Mogill (P17865)
Attorneys for Plaintiff
27 E Flint St, 2nd Floor
Lake Orion, MI 48362
(248) 814-9470
kmogill@bignet.net

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2024, I electronically filed the foregoing documents with the Clerk of the Court of the United States District Court for the Eastern District of Michigan using the Court's ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Dated: September 3, 2024

/s/ Tara Lank

Tara Lank, Paralegal